



Counterfeit Avoidance Policy

GST is committed to preventing the purchase, acceptance, and distribution of fraudulent and counterfeit electrical, electronic, and non-electronic parts. GST policy is to purchase only new and authentic commercial-off-the-shelf (COTS) from authorized suppliers/distributors or the original manufacturer of the product.

Definition:

- Counterfeit Material - Material that has been confirmed to be a copy, imitation or substitute that has been represented, identified or marked as genuine and/or altered without authority with intent to mislead, deceive or defraud.
- Counterfeit Part - Part made or altered to imitate or resemble an “approved part” without authority and is intended to mislead or defraud by passing as original or genuine.
- Fraudulent Material - Any suspect material misrepresented to the Customer as meeting the Customer’s requirements.
- Suspect Material - Any part with an indication that it may have been misrepresented by the Supplier or Manufacturer and may meet the definition of counterfeit material/part or fraudulent material.
- COTS - Commercial-off-the-Shelf (COTS) components and/or systems.

GST Control of Nonconforming Product

All deliverable supplies that are found to be nonconforming against specified requirements are identified, documented, quarantined, evaluated and dispositioned to prevent unintended use or delivery. Necessary actions are taken to contain the effect of the nonconformity on other products or processes. This applies to incoming product (vendor-supplied), in-process product, final product and Customer returned product. The final decision is conducted by the related GST Department Manager. Disposition is performed by GST RMA Manager.

“Nonconforming product” (NCP) is any product used by GST or returned from the Customer that does not meet:

- Acceptable inspection limits
- Acceptable test results
- Customer requirements
- Material shelf life limits
- Statutory or regulatory requirements (safety, packaging, etc.)
- Not functioning to the manufacturer specifications
- Incorrect product ordered/delivered by the Supplier
- Recalled product by the Manufacturer or the Supplier
- Counterfeit Items identified by GST

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- Product damaged or changed during delivery to GST
- Product damaged or changed at GST

The replacement item for the NCP will be initiated by the GST Return Merchandise Authorization (RMA) Manager. The RMA Manager will notify the Supplier of the NCP and request for replacement product or refund. If refund is requested, the GST Purchasing Manager will be notified by the RMA Manager to purchase replacement product. If the NCP is identified as counterfeit or suspect, the RMA Manager will wait for OEM/Manufacturer instructions.

Seller's Risk Mitigation

Seller shall maintain a Counterfeit Item risk mitigation process internally and with its suppliers.

The Seller shall participate in the Government Industry Data Exchange Program (GIDEP) monitoring and acting on GIDEP reports which affect product delivered to the Buyer. When suspect or confirmed counterfeit item(s) associated with this purchase order are discovered the Seller shall issue a GIDEP report and shall ensure suspect counterfeit items are not delivered to GST. Seller shall immediately notify GST with the pertinent facts if Seller becomes aware or suspects that items delivered in accordance with the GST purchase order are or contain suspect or confirmed counterfeit items. When requested by GST, Seller shall provide OEM documentation that authenticates traceability of the affected items to the applicable OEM.

Seller shall provide evidence of the Sellers risk mitigation process to the GST Buyer upon request.

Seller shall purchase material directly from OEMs or from Authorized Distributors of OEMs and shall obtain approval from the GST Buyer if items required to satisfy this order cannot be procured from these sources. Seller shall present complete and compelling support for any request to procure from sources other than OEMs their Authorized Distributors and include in the request all actions completed to ensure the parts thus procured are not counterfeit Items.

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